

**IN THE DISTRICT COURT OF UNITED STATES OF AMERICA
NORTHERN DISTRICT OF ALABAMA**

UNITED STATES OF AMERICA,)
)
 PLAINTIFF,)
 V.) CASE NO. 2:23-cr-170
)
 FRED LEE PLUMP, JR.,)
)
 DEFENDANT.)
)

MOTION FOR LEAVE TO FILE A DOCUMENT UNDER SEAL

COMES NOW the Defendant, Fred Lee Plump, Jr., by and through his counsel,
and respectfully moves this Honorable Court for leave to file a document containing
personal identifying and/or HIPAA protected information under seal.

WHEREFORE, PREMISES CONSIDERED, we respectfully request this Honorable Court to allow Counsel for the Defendant to file said document under seal.

RESPECTFULLY SUBMITTED,

l/s Richard S. Jaffe
 RICHARD S. JAFFE

l/s Michael P. Hanle

MICHAEL P. HANLE

l/s Michael W. Whisonant, Jr.
MICHAEL W. WHISONANT, JR.

OF COUNSEL:
 JAFFE, HANLE, WHISONANT & KNIGHT, P.C.
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 BIRMINGHAM, AL 35205
 205-930-9800

CERTIFICATE OF SERVICE

I do hereby certify that I have on this the 14th day of July 2023 served a copy of the foregoing by electronically filing to all parties involved.

l/s Michael P. Hanle
MICHAEL P. HANLE